



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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DMP  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 1, 2018

**By FedEx and ECF**

Robert J. Cleary, Esq.  
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Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

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Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and in response to your request dated June 28, 2018, the government hereby furnishes Person Encounter Lists for the 53 China Rilin workers identified in Exhibit A to the government's June 19, 2018 letter, which are Bates numbered DZ067413-DZ067470. These materials have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37).

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Douglas M. Pravda  
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Enclosures (DZ067413-DZ067470)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)